

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION

CIVIL ACTION NUMBER:
1:19-md-02875-RBK-JS

STATUS CONFERENCE

**Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101
Wednesday, February 26, 2020
Commencing at 2:30 p.m.**

B E F O R E: **THE HONORABLE JOEL SCHNEIDER,
UNITED STATES MAGISTRATE JUDGE**

A P P E A R A N C E S:

MAZIE SLATER KATZ & FREEMAN, LLC
BY: ADAM M. SLATER, ESQUIRE
103 Eisenhower Parkway
Roseland, New Jersey 07068
For the Plaintiff

GOLOMB & HONIK PC
BY: RUBEN HONIK, ESQUIRE
1835 Market Street, Suite 2900
Philadelphia, Pennsylvania 19103
For the Plaintiff

KANNER & WHITELEY LLC
BY: CONLEE S. WHITELEY, ESQUIRE
LAYNE CLARK HILTON, ESQUIRE
701 Camp Street
New Orleans, Louisiana 70130
For the Plaintiff

Karen Friedlander, Official Court Reporter
friedlanderreporter@gmail.com
(856) 756-0160

Proceedings recorded by mechanical stenography;
transcript produced by computer-aided transcription.

1 A P P E A R A N C E S : - C O N T I N U E D

2

3 DUANE MORRIS LLP
4 BY: SETH A. GOLDBERG, ESQ.
5 BARBARA A. SCHWARTZ, ESQUIRE
6 30 S. 17th Street
7 Philadelphia, Pennsylvania 19103
8 For the Defendant ZHP and the Joint Defense Group

9

10 PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI LLP
11 BY: CLEM C. TRISCHLER, ESQUIRE
12 JASON M. REEFER, ESQUIRE
13 One Oxford Centre, 38th Floor
14 Pittsburgh, Pennsylvania 15219
15 For the Defendant Mylan and the Joint Defense Group

16

17 GREENBERG TRAURIG LLP
18 BY: LORI G. COHEN, ESQUIRE
19 3333 Piedmont Road, NE, Suite 2500
20 Atlanta, Georgia 30327
21 For the Defendant Teva and the Joint Defense Group

22

23 HILL WALLACK LLP
24 BY: ERIC I. ABRAHAM, ESQUIRE
25 21 Roszel Road
Princeton, NJ 08540
For the Defendant, Hetero Labs Ltd.

26

27 BARNES & THORNBURG LLP
28 BY: SARAH E. JOHNSTON, ESQUIRE
29 2029 Century Park East, Suite 300
30 Los Angeles, CA 90067-2904
31 For the Defendant, CVS Health Co.

32

33 CIPRIANI & WERNER, P.C.
34 JESSICA M. HEINZ, ESQUIRE
35 450 Sentry Parkway, Suite 200
36 Blue Bell, PA 19422
37 For the Defendant, Aurobindo Pharma USA, Inc., Aurolife
38 Pharma, LLC and Aurobindo Pharma, Ltd.

39

40 NORTON ROSE FULBRIGHT
41 BY: D'LESLI M. DAVIS, ESQUIRE
42 1301 Avenue of the Americas
43 New York, NY 10019-6022
44 For the wholesalers and McKesson individually

45

1 THE DEPUTY CLERK: All rise.

2 (OPEN COURT, February 26, 2020, 2:30 p.m.)

3 THE COURT: Good afternoon, everyone. Please be
4 seated. We're on the record in re: Valsartan, Docket No.
5 19-2875.

6 For purposes of the record, the Court met with
7 leadership counsel starting at 10 o'clock this morning. In a
8 perfect world, everyone would have been able to participate
9 and be present and at least listen in. But we don't live in a
10 perfect world and it's unwieldy enough just the size of the
11 leadership team, and it's the Court's firm opinion that if we
12 opened up the meeting to everybody, nothing would be
13 accomplished.

14 The Court has gone to great pains in the case to make
15 sure that liaison counsel was appointed to appropriately
16 represent all the interests in the case, to make sure that
17 exceptional counsel are appointed as liaison counsel, and the
18 Court has absolutely no hesitation or reservation that liaison
19 counsel has and will faithfully undertake their obligations.

20 So I don't want anyone to feel upset, I hope, or
21 chagrined because they can't sit in on the meeting, but in
22 the Court's view, this case is no different from any other
23 large case where it's just unwieldy for everybody to
24 participate. So I want to start out by saying that.

25 Second thing is, I don't think anyone's interests --

1 I know for a fact that no one's interests are prejudiced by
2 what was discussed. When we're off the record, we could be
3 more candid with each other. In the past, that has worked and
4 the Court will continue to have these off-the-record
5 discussions, so hopefully, we can have more candid
6 discussions. But that's why we have this session on the
7 record and whoever wants to say something can say whatever
8 they want, make any objection, position you want known. But I
9 just want to be clear why we proceeded as we did this morning.

10 Coming out of that meeting, we really didn't reach a
11 -- the hope was to reach a consensus on how to continue with
12 the management of the case. A consensus couldn't be reached,
13 especially because Judge Kugler is not here present in person.
14 He will make and obviously makes the ultimate decision about
15 important issues, like when 12(b) motions are decided, when
16 and if class certification is decided, when and how the trial
17 is going to proceed.

18 So what the Court is going to direct is as follows:
19 Within in a week, the plaintiffs and the defendants are each
20 going to submit a five-page simultaneous letter brief on how
21 they propose the case be managed and tried in the future, to
22 touch on the class cert issue and the Rule 12(b) motions and
23 trial. That's the first matter.

24 We'll go through the agenda today and touch on the
25 so-called, quote unquote, macro issues. Maybe we'll resolve

1 some of those, maybe we won't. To the extent we don't resolve
2 them, I'm going to ask plaintiff to submit an opening letter
3 brief by March 9 and the defendants to respond by March 18,
4 and we'll tee up those issues for decision at the in-person
5 conference at the end of March.

6 I addressed with the defendants whether we could
7 switch the March 25th meeting to March 24. Unfortunately, it
8 was not feasible, so we're going to keep the March 25th date
9 for the in-person conference, and I think I have on my
10 calendar March 18th -- is it March 18th? No. March 11th for
11 the Valsartan monthly conference call.

12 So, we spent, I don't know, two, three, or four hours
13 discussing and I'm afraid that's all we accomplished, which is
14 not much, but I appreciate that all counsel spoke candidly
15 about their positions and everyone can be rest assured that
16 their interests are more than adequately and zealously being
17 protected, and I know I'm confident that none of the
18 nonparticipants were prejudiced in any respect by what was
19 discussed.

20 MR. GOLDBERG: Your Honor --

21 THE COURT: Yes, sir.

22 MR. GOLDBERG: On the five-page letter brief in the
23 few minutes where we had a break, we talked with plaintiffs.
24 Due to some scheduling issues, we propose having these filed
25 on Monday, March 9th, if plaintiffs are okay with that.

1 THE COURT: No problem. No problem at all.

2 MR. GOLDBERG: Thank you.

3 THE COURT: So March 9, the five-page letter briefs
4 -- Judge Kugler is going to shoot me because he would probably
5 say three pages, but I'm giving you five pages.

6 And just to confirm what I told each side, I
7 personally think it would be persuasive if each side, with
8 whatever their proposal is, if they could point to past cases
9 where what they're proposing was used. It just seems to me
10 that that would be persuasive on how Judge Kugler decides what
11 to do in the future.

12 Okay. Anyone out there want to say something about
13 -- oh, Hetero, welcome aboard.

14 MR. ABRAHAM: Thank you, Judge.

15 THE COURT: Why don't you come up. You are an API
16 manufacturer, right?

17 MR. ABRAHAM: Yes, sir.

18 THE COURT: So you get a seat in the penthouse.

19 Was Hetero USA in the case, even though you haven't
20 been in the case?

21 MR. ABRAHAM: Yes, sir. Also represented here.

22 THE COURT: So are you up to date from Hetero USA
23 about what's been going on and --

24 MR. ABRAHAM: Yes, sir.

25 THE COURT: Okay. So have you met and conferred with

1 plaintiffs about a date to get your core discovery produced
2 and hopefully maybe come to an agreement on the relevant
3 timeframe for the ESI and document production in the case? I
4 happened to look at the order earlier this morning. We set
5 the relevant timeframes for the other API manufacturers, but I
6 know Hetero, we didn't decide that. Have you and the
7 plaintiffs hopefully met and discussed that issue yet?

8 MR. ABRAHAM: Yes and no. My new best friend is Miss
9 Hilton and she and I are in regular, I guess, communication.
10 We have been conferring about those subjects. We've not yet
11 established deadlines or timeframes. I'm still working with
12 my clients so I can establish those, but I'm well aware of
13 what our sort of catchup work is and we're working on it.

14 THE COURT: Okay. Why don't you put it on the agenda
15 for the March 11 call and if you need more time, that's fine,
16 we'll put it on the agenda for the March 25th meeting, the
17 Hetero issues, because let's bring those to a head. I'm glad
18 you're on board, but as we gave the message to Hetero USA, the
19 train has left the station.

20 MR. ABRAHAM: Yes, sir.

21 THE COURT: So we're proceeding ahead and I want to
22 make sure that Hetero gets caught up to date as soon as
23 possible.

24 MR. ABRAHAM: You have my word.

25 THE COURT: Within reason.

1 MR. ABRAHAM: Yes, sir.

2 THE COURT: Any questions?

3 MR. ABRAHAM: Can I go back to the back row?

4 THE COURT: Yeah, you certainly can go back to the
5 cheap seats.

6 MS. HILTON: Your Honor, Layne Hilton for the
7 plaintiffs. I also want to add that we also have another API
8 manufacturer who has now appeared in the case, Aurobindo.

9 THE COURT: Oh, great.

10 MS. HILTON: Aurobindo Pharma Limited, Miss Heinz, as
11 it turns out, represents the Indian entity as well, and she
12 and I met and conferred on Monday.

13 THE COURT: Do you have the USA company?

14 MS. HEINZ: Yes, now I have everybody.

15 THE COURT: If I remember right, wasn't Aurobindo
16 cooperative in terms of discovery?

17 MS. HEINZ: They produced what they had. There is
18 some -- I was talking to Miss Hilton about it earlier this
19 week. There is some question of what we still owe on behalf
20 of the NDA, so I'm working on that.

21 THE COURT: Do you have an agreement what you are
22 working on relevant timeframe and core discovery?

23 MS. HEINZ: We didn't discuss exact deadlines but we
24 did discuss that I'm going to try and get certain things
25 sooner rather than later. Happy to put it on the agenda for

1 the teleconference and we'll try to get the agreements.

2 THE COURT: So whatever issues you have with Hetero
3 and Aurobindo that you can't work out, we'll either put it on
4 the agenda for the call for the -- no later than the meeting
5 at the end of the month.

6 MS. HILTON: Yes, Your Honor.

7 THE COURT: And it sounds like we'll get caught up to
8 speed, and welcome aboard.

9 Anybody else want to -- before we get to the agenda
10 in the letters, anybody else?

11 Okay. So maybe we'll work from Mr. Slater --
12 Mr. Goldberg's letter. First issue was the downstream
13 discovery and we have the retailer macro issues. Generally,
14 where does that stand, generally?

15 MS. JOHNSTON: Your Honor, Sarah Johnston on behalf
16 of the retailer defendants. We've made some pretty good
17 progress with plaintiffs over the last couple of weeks in
18 terms of negotiating the scope of Rule 34 discovery and the
19 defendant fact sheet. We received on Monday the latest rounds
20 of edits to Rule 34 discovery and we are awaiting revisions on
21 the DFS. We've identified in our C & C statement, the issues
22 that we think are still percolating and that I think we're
23 going to continue to make more progress towards resolving.

24 THE COURT: Why do we have an issue with the
25 definition of Valsartan? We're a year into this case.

1 MS. JOHNSON: Well, I think it actually is tied to
2 generally the scope of production. So is Valsartan recalled
3 versus not recalled. Are we talking about from the outset of
4 marketing and into the present.

5 THE COURT: Yes.

6 MS. JOHNSON: And I think that we would prefer to
7 continue to discuss these issues. I think we'll be able to
8 resolve them with plaintiffs and --

9 THE COURT: I don't know if you were here when we
10 discussed these issues, but this case is not just about the
11 recalled Valsartan. If it was, it would be a very easy case.
12 Plaintiff is arguing at least as to some of the defendants,
13 that all the Valsartan was contaminated or may have been
14 contaminated. So we can't just focus on recalled Valsartan.
15 That was the Court's reasoning when it ruled previously in the
16 case.

17 So I don't know why it would be different for the
18 retailers as to the API people.

19 MS. JOHNSON: I understand that, Your Honor, and
20 actually, that was part of the discussion that we had early in
21 the discovery talks where it was unclear whether plaintiffs
22 were seeking documents related to Valsartan that was
23 manufactured by any entity, versus the manufacturers that are
24 named in this litigation, which is not the universe of
25 Valsartan manufacturers. So there was some significant back

1 and forth on that, and that has affected the further
2 discussions, but we're getting very close.

3 THE COURT: Document retention policies, is it a big
4 deal to produce the company's document retention policy?

5 MS. JOHNSON: Again, that's another issue we're
6 working to narrow, but in the beginning, it was document
7 retention policies, period. Now we're trying to focus on the
8 issues in the case and --

9 THE COURT: Just the key records that they're looking
10 for. I'm surmising plaintiff's concern is when they ask the
11 defendants for documents, your group, and your group says, we
12 don't have these documents, they want to know if they existed
13 at one time and should they exist somewhere, and that's why
14 they need to see the retention policies.

15 So it seems to me that's a pretty straightforward
16 issue, just produce it and designate it as confidential and
17 away we go.

18 What's so hard about that?

19 MS. JOHNSTON: I think that we still need to discuss
20 the scope of those things because I think there is a
21 difference between saying, you know, we don't have those
22 documents, which is generally not the conversation that we're
23 having. We're saying those these documents don't exist for
24 this particular legal reason, not that we're trying to hide
25 the ball on what may have existed at one point but doesn't

1 because it's subject to some document destruction protocol.

2 So I think that we can discuss, figure out which,
3 which retention policies, if any, are pertinent to the issues
4 in litigation. I think we can make that progress, but I think
5 that it does require a little bit more back and forth.

6 THE COURT: Indemnification agreements, aren't they
7 relevant in the case?

8 MS. JOHNSON: I think that there are a number of
9 things that can be said to be relevant for just about any
10 issue in this case. I think the indemnifications agreements
11 for the issues that we're specifically discussing working at
12 for trial, don't have any, any true bearing on --

13 THE COURT: I would think just the indemnification
14 issues for any liability arising out of this case. Doesn't
15 plaintiff have a right to know whether they exist so that they
16 can finish preparing their trial strategy?

17 MS. JOHNSTON: I'm not sure what issue that would
18 speak to, if we're talking about what happens at the early
19 Rule 34 stage.

20 THE COURT: Isn't it the same reason why insurance
21 agreements have to be produced under Rule 26? Wouldn't
22 indemnification agreements come under the same rubric?

23 You don't have to answer that.

24 MS. JOHNSTON: I don't think so. I think that there
25 are a number of reasons that insurance policies are produced

1 under Rule 26.

2 THE COURT: Why don't you think about it.

3 Okay. So we know that the plaintiffs are going to
4 brief it by March 9 and the retailers are going to respond by
5 March 18th. I would just ask -- we don't need long letter
6 briefs -- if you could just address each of these issues in a
7 paragraph or two or three.

8 MS. JOHNSTON: Your Honor, I think we will do our
9 best to narrow them so that there are very few paragraphs to
10 look at, but we'll do our best to get there.

11 What I would propose, though, just looking at the
12 actual calendar, I think that it would make sense to either
13 move up the deadline for plaintiffs' briefing or to push back
14 by a day or two, the defense briefing, just to give us equal
15 time --

16 THE COURT: How about 3-20?

17 MS. JOHNSTON: Perfect.

18 THE COURT: How about 3-23 so -- no, I'll say 3-20,
19 so you don't have an associate working over the weekend.

20 MS. JOHNSTON: Well, I want to give you the weekend
21 to really consider those issues.

22 THE COURT: No, 3-23 is a Friday. I'll be reading
23 your briefs over the weekend.

24 MS. JOHNSTON: Fair enough.

25 MS. WHITELEY: Your Honor, this is Conlee Whiteley.

1 I believe that the issues were adequately addressed here and
2 we will brief those details that we cannot agree on if we
3 can't -- we will continue working until then.

4 There's one other thing I wanted to raise, though, is
5 part of our negotiations back and forth have been some of the
6 things we don't know whether the retailer defendants have or
7 whether the wholesalers have and we've encouraged them to just
8 tell us, we don't have that, you're looking at the wrong
9 person. And we started a running list of those and what we'd
10 like to do at some point rather soon is to get some
11 confirmation in writing that we don't do -- you know, we don't
12 keep this type of information. And we've been doing it
13 informally so far, but we would like to have that as a result.
14 Whether it be that that's part of their written response for
15 our discovery or we put it over to the side in the form of a
16 stipulation or some type of conversation.

17 THE COURT: Miss Johnston, I think that's a great
18 idea. If there are certain documents that as we know your
19 clients or your group has taken the position, we don't have
20 these, if you could just send a letter to Ms. Whiteley, that
21 would advance the ball tremendously in the case.

22 MS. JOHNSTON: And I think that we've communicated in
23 a number of different letters and versions of discovery drafts
24 that we've done so far, but we will -- we did discuss this on
25 our last call and it's something that we are discussing among

1 the retailer defendants and we'll discuss with Miss Whiteley
2 further.

3 THE COURT: Great.

4 MS. WHITELEY: And the same goes with the wholesaler
5 defendants. We've had those discussions, and then the other
6 item would be that with both sets of defendants, we talked
7 about trying to get exemplar documents in a way to close the
8 gap, because if we actually see some of the documents, we may
9 be able to use the same vocabulary. There are issues in
10 certain ways and I believe both sets of defendants were
11 considering that request and they're going to get back to us.

12 THE COURT: I think that's a great idea to help
13 advance the ball to get exemplar documents, and I would
14 encourage the wholesalers and retailers to do that.
15 Experience shows if we can get these issues resolved once and
16 for all early, it saves so much time and money for your
17 clients in the future if they don't have to go back and
18 reinvent the wheel. So I'm a firm believer that resources
19 invested in the short term payoff in the long term, okay?

20 MS. WHITELEY: Thank you.

21 MS. JOHNSTON: Thank you, Your Honor.

22 THE COURT: Okay. I think that takes us through the
23 wholesaler issues. Same thing, plaintiffs will brief it by
24 March 9, you'll brief it by March 23rd.

25 MS. DAVIS: D'Lesli Davis from Norton Rose Fulbright,

1 representing the wholesalers in this argument, but
2 representing McKesson Corporation individually.

3 Quick question about need for affidavit and evidence
4 supporting what will ultimately be objections to the proposed
5 RFPs we're discussing now.

6 THE COURT: Good question. If it's a burden
7 argument, I need affidavits. If you want to submit affidavits
8 from experts or knowledgeable people, that's perfectly fine.
9 I do have a question about that, because this issue is raised
10 by the plaintiffs. If they submit, quote unquote, expert or
11 consultant affidavits, they're concerned that they don't want
12 to reveal the identity of the person.

13 Is there any objection if plaintiffs produce the
14 affidavits but redact the name and submit the CV to the Court
15 in camera? If the defendants have that same issue, that's
16 fine with me, redact the name and submit the CV in camera.

17 MS. DAVIS: And are you speaking specifically to
18 these macro discovery issues?

19 THE COURT: Yes.

20 MS. DAVIS: Because I wouldn't want to be speaking
21 for the whole joint defense group.

22 THE COURT: No.

23 MS. DAVIS: I have no problem with that process at
24 all. I'm not sure it requires affidavits from the plaintiffs.
25 What we're needing, though, of course, is a specific statement

1 of relevance for the macro category and I'm assuming we'll get
2 that.

3 THE COURT: You might get affidavits from the
4 plaintiff, I don't know, I haven't seen it.

5 MS. DAVIS: I have no problem with the process you
6 proposed.

7 THE COURT: My proposal was submit the letter briefs,
8 but if plaintiffs, for example, hypothetically, I don't know
9 what's going to happen, submit affidavits from experts that
10 say, I need this information to produce a model or a report
11 for class certification purposes, that's clearly relevant to
12 whether the Court deems that produceable or not, right?

13 MS. DAVIS: Correct.

14 THE COURT: That can't be argued. So if the
15 defendants want to respond to that, that's fine.

16 MS. DAVIS: And I'm fine with the fact that the
17 expert in the proposed affidavit would not be disclosed. I
18 believe Your Honor suggested as long as the plaintiffs will
19 represent the expert actually exists.

20 THE COURT: No, they're going to produce the CV to
21 the Court in camera.

22 MS. DAVIS: Perfect.

23 THE COURT: Defendants can do the same thing if
24 they're concerned about -- if they're going to use a, quote
25 unquote, expert or consultant, before they designate that

1 person for trial and they want to protect that person's
2 identity, they can do the same thing.

3 MS. DAVIS: Thank you, Your Honor.

4 THE COURT: But if you're going to argue burden, I
5 need an affidavit from the client.

6 MS. DAVIS: Absolutely. And I'm not anticipating
7 having expert affidavits in support of the macro issues but we
8 would anticipate having client affidavits on burdensomeness
9 and disproportionality. And additionally, there may be some
10 exemplar documents that we submit with the letter briefing. I
11 want to make sure that that's okay with the Court as well.

12 THE COURT: Perfectly appropriate. Absolutely
13 appropriate.

14 MS. DAVIS: And then the expectation would be that
15 those previewed objections would be ruled on at the next
16 hearing, correct?

17 THE COURT: That's my goal.

18 MS. DAVIS: We had outlined some of these issues but
19 I think you've already discussed several of them with Ms.
20 Johnston. I'm happy to address any other ones you'd like to
21 hear about now, or we can just wait for the briefing
22 opportunity.

23 THE COURT: Let me see if there's any low-hanging
24 fruit.

25 Recalled verses non-recalled Valsartan drugs?

1 MS. DAVIS: Same as what Ms. Johnston was discussing,
2 and it may be that they make progress in their meet and confer
3 on that, that can inform what we're doing.

4 THE COURT: Discovery about the discovery, the
5 retention policies. Is there a distinction between documents
6 that -- there is a distinction between documents that never
7 existed or documents that aren't available anymore. If it's
8 the former, then wouldn't document retention policies be
9 relevant? And you could read the tea leaves with regard to
10 the indemnification agreement for liabilities arising out of
11 this case.

12 MS. DAVIS: Certainly, and we'll see where Ms.
13 Johnston gets with that. I think the concern on document
14 retention, of course, had been that there was no specificity
15 as to what document retention policies needed to be produced
16 and their document retention policies for each functional area
17 in the company.

18 THE COURT: You're absolutely right. I think you're
19 going to get that.

20 MS. DAVIS: Okay.

21 THE COURT: I think plaintiffs are going to focus on
22 exactly what they want.

23 MS. DAVIS: For final clarification, when we discuss
24 the idea of the use of affidavits or the discussion of macro
25 issues, as it currently stands, we're talking about the topics

1 that you have in the letter agreement. There may be
2 additional ones by the time of the filing next time. It's not
3 even a defined term.

4 THE COURT: I don't want to say the more the better,
5 but whatever you present, we'll address.

6 MS. DAVIS: Thank you, Your Honor.

7 MR. SLATER: Your Honor, one request. If counsel is
8 going to submit exemplar documents, we'd just request that
9 they be documents that we've been provided. I would assume
10 that they would be documents that we already have or that
11 they're going to produce to us in advance. We prefer not to
12 see them for the first time when the brief comes to us, then
13 there's no way to address and prepare for that.

14 MS. DAVIS: I have no problem. We'll obviously meet
15 and confer in an attempt to get some statement of the
16 relevance of the documents that they're seeking, but I think
17 we're going to try to show them some things that we think
18 they're asking for. I can't tell you when I'll be able to get
19 that. We're going to be scrambling with the client, but we
20 will certainly share with them before the day of the filing of
21 the letter brief.

22 THE COURT: Mr. Slater, if you need to respond to the
23 newly produced documents, you know, if you can get any type of
24 short reply in any time other than the morning of the 25th,
25 that would be fine.

1 MR. SLATER: Got it.

2 THE COURT: I know that last night's letters came in
3 a little before 5 and a little after 5, so.

4 MR. SLATER: Was that Eastern or Pacific?

5 THE COURT: I'm sorry?

6 MR. SLATER: Eastern or Pacific time?

7 THE COURT: That was Eastern.

8 Judge Chagares is head of the judicial procedural
9 rule, or committee, or something like that and they're
10 exploring whether there should be a rule change about 24-hour
11 filing, e-filing. So that's being looked at.

12 Okay. No. 2 on Page 9, Improvidently Filed Short
13 Form Complaints.

14 Are there any left?

15 MS. SCHWARTZ: Good afternoon Your Honor, Barbara
16 Schwartz for the ZHP defendants. So there are -- as you
17 recall, on mid January you had ordered that certain short form
18 complaints that had been filed improperly or not loaded to MDL
19 centrality properly would be -- should be remedied.

20 At Exhibit A, we provide a list of a handful of those
21 complaints that you had ordered to be fixed and have not been
22 fixed at this point in time. And then also in Table B of that
23 exhibit we provide a listing of more recently filed short form
24 complaints that have the same type of technical issues.

25 THE COURT: So exhibit -- the cases on Exhibit -- on

1 Tables A and Table B of Exhibit A should get orders to show
2 cause.

3 MS. SCHWARTZ: Yes, Your Honor.

4 THE COURT: Well, we hope that's cleared up by the
5 next conference, but that's what the order says, so let's
6 clean that up. We'll clean that up.

7 Overidentification. This is a substantive issue, not
8 just an administrative issue like the previous issue was.
9 Where do we stand on that?

10 MS. SCHWARTZ: So you recently issued an order of
11 February 19th giving those plaintiffs who had previously been
12 identified as overidentifying defendants until mid-March to
13 remedy their short form complaints. So at Exhibit B, we just
14 provide a list of those that are still outstanding on that
15 issue. But in the meantime, we've also identified about a
16 half dozen more which have similar issues where they are
17 either identifying every single defendant or identifying only
18 John Doe defendants, and we would ask that a similar order be
19 applied to those.

20 THE COURT: Okay. That's a shame. This is a shame.
21 We're going to invite the plaintiffs' lawyers for the cases on
22 Exhibit B, Table A, to be here in person at the end of March
23 to explain why they checked every box, and we'll give notice
24 to the firms on Table B. This is not an insignificant issue,
25 you know. It's just not acceptable that the plaintiffs

1 willy-nilly just checked the boxes. There's obligation under
2 the rules. They're not dispensed with because we're in an
3 MDL, and we're going to hold their feet to the fire.

4 So we're going to issue invitations to Exhibit B,
5 Table A and a notice to Exhibit B, Table B.

6 MS. SCHWARTZ: Thank you.

7 THE COURT: Plaintiffs' fact sheets. Apparently,
8 there are some people who haven't answered them, but is the
9 process to raise disputes being followed? Wasn't there an
10 issue about plaintiff had to be notified first for two weeks?

11 MS. SCHWARTZ: Yes, Your Honor. So we've attached
12 Exhibit C, which is our first listing of plaintiff fact sheets
13 that we believe at this point would be subject to the show
14 cause process. Everyone included on this list has been served
15 a deficiency notice and at least two weeks have elapsed since
16 that notice.

17 THE COURT: But -- I'm sorry, in the Court's order,
18 does it say that plaintiffs' liaison counsel has to be given
19 notice first?

20 MS. SCHWARTZ: Notice --

21 THE COURT: Is that the argument you raise,
22 Mr. Slater?

23 MR. SLATER: Right.

24 THE COURT: So, for example, on Page 2 of Exhibit C,
25 it says, "Plaintiff's fact sheets more than two weeks after

1 deficiency notice was served." That's not what I was thinking
2 of.

3 Anyway, what I'm questioning, if the order states
4 that liaison counsel or leadership counsel for the plaintiffs
5 has to be given notice and then if it isn't clarified within
6 two weeks, then you can list it, did they get notice?

7 MS. SCHWARTZ: Right. When we served the deficiency
8 notices, we served them on the counsel for the individual
9 plaintiff as well as on Mr. Slater and I believe whoever else
10 is required by the order.

11 THE COURT: Okay.

12 MS. SCHWARTZ: Mr. Stanoch.

13 THE COURT: So is it your position, then, that the
14 first order to show cause should be listed to all the firms,
15 slash, cases listed on Exhibit C?

16 MS. SCHWARTZ: I believe pursuant to CMO-16 they must
17 appear on two agendas before the order to show cause is
18 issued. So this is the first agenda where we're listing them
19 pursuant to the order.

20 THE COURT: Okay.

21 MR. SLATER: It wouldn't be everybody, because you
22 have different groups. You have the first group that you say
23 that there was no amendment or supplementation following a
24 deficiency notice. Then you have a group that did amend or
25 supplement. So that's been taken care of. I'm not sure why

1 they're still on the list. And then you have another group
2 where it says there are disputes still remaining. That
3 wouldn't be anything that would be subject to an order to show
4 cause either. That's just a dispute potentially as to the
5 sufficiency of the information, but they've been responded to.

6 THE COURT: So how are those -- according to the
7 order, how are those disputes worked out? Are they worked out
8 between defendants' and the plaintiffs' counsel in those
9 cases?

10 MR. SLATER: I would think so. And then if there's a
11 particular issue that we couldn't resolve, I guess it would
12 come to Your Honor, but I can't imagine that any of these
13 issues would.

14 MS. SCHWARTZ: So I'm looking at the order right now,
15 it's case management Order 16, Docket No. 249. In the second
16 section of that order it lays out a process within three weeks
17 of receipt of the fact sheet, defendants will send a
18 deficiency notice. We did that, notifying both the individual
19 counsel and liaison counsel. It then orders that the
20 plaintiff will respond by letter within two weeks of the date
21 of service, and then the next piece is that if the dispute is
22 not resolved, defendants shall put the dispute on the agenda
23 for the next in-person conference, which is what we have done
24 here.

25 THE COURT: Okay. But I don't know what the dispute

1 is. It may be for the end of March conference. If there are
2 disputes, just list them out and we'll deal with them.

3 MS. SCHWARTZ: Okay. We can add that.

4 THE COURT: But as I understand it, then, there's no
5 order to show causes that need to be entered for Exhibit C,
6 because it's the first listing.

7 MS. SCHWARTZ: That's right.

8 THE COURT: Okay. Great. All right. And if they're
9 not cleared up, then after the second listing, then the OSC is
10 entered.

11 MS. SCHWARTZ: Yes. Thank you.

12 THE COURT: Next issue, search terms and ESI update.
13 I'm not sure why these search terms are being revised. I
14 thought they were already Court ordered.

15 MS. HILTON: Your Honor, the attorney who is
16 negotiating search terms, Behram Parekh, isn't here, but as I
17 understand it, there are some issues with some false positives
18 related to the terms that were agreed upon, and so I think
19 defendants are in the process of making counterproposals for
20 those terms which are yielding unusually high hit counts. I
21 think there are some instances where some of the defendants
22 have disclaimer language at the bottom of every single e-mail
23 and some of our terms hit upon that disclaimer language and so
24 I think there the parties are in the process of working out
25 those sort of more granular issues that relate to, you know,

1 each individual defendants -- documents.

2 THE COURT: All right. I'll stay out of it unless
3 there's a dispute.

4 Losartan and Irbesartan update. Plaintiffs'
5 leadership team, is there going to be any proposal?

6 MR. SLATER: We've had conference calls with various
7 attorneys who showed interest. We wrote to them in the last
8 several days with a -- what we thought made sense. We've
9 gotten some questions from some of the proposed chair. So
10 we're working through. We hope to have it done by the next --
11 in the court conference.

12 THE COURT: Fine.

13 Amendment of Economic Loss Master Complaint. This is
14 what the Court has decided on that. It came -- the Court
15 realized that it's not going to decide the futility issue with
16 regard to that motion to amend. I'm going to enter an order
17 that states in effect, not in these words necessarily: Over
18 defendants' objection, plaintiff is granted leave to amend by
19 X date without prejudice to defendants' right to assert
20 whatever defenses they want at the appropriate time.

21 I don't think a motion is necessary because if we're
22 not going to decide futility, the only arguments that can be
23 made are lateness, bad faith, et cetera. None of those apply.
24 So you're not going to have to file a motion, plaintiffs, but
25 all of defendants' defenses are obviously going to be

1 preserved and the Court order is going to specifically note
2 that the order is entered over defendants' objection.

3 MR. SLATER: I understand.

4 Your Honor, there's one issue that we didn't mention,
5 it's in our letter, but it relates to the search terms of the
6 ESI issue. As we pointed out to the Court, these productions
7 we thought were supposed to be rolling productions and none of
8 them have started. We can't get any indication of when
9 they're going to start and we're very concerned that all
10 indications that you'll get them by the deadline, which is not
11 what the intent of the order is.

12 THE COURT: I have a note to raise that if you
13 didn't, Mr. Slater.

14 I don't have the order in front of me. I can get it
15 in these notebooks. But I thought the order specifically
16 stated dates when the rolling production had to start. Am I
17 right about that?

18 MR. SLATER: I don't recall if it said when the
19 rolling production had to start. I think it was when it had
20 to be completed.

21 THE COURT: Well, let me get it out, because if I was
22 doing my job, it should be in there, because I anticipated
23 this issue.

24 Just bear with me one moment.

25 I'm looking at the December 23rd, 2019 order, Docket

1 No. 328, Page 2, second paragraph up from the bottom.

2 "Ordered: Defendant's documents shall be produced on a
3 rolling basis. The first group of responsive documents and
4 ESI shall be produced no later than March 2, 2020, with
5 subsequent rolling productions no later than the first day of
6 each month."

7 So you should get production starting on March 2nd,
8 except for ZHP.

9 ZHP, can you help us understand what's going on with
10 your client in China.

11 MR. GOLDBERG: Sure, Your Honor, the best I can.

12 THE COURT: I think that virus establishes good
13 cause, don't you?

14 MR. GOLDBERG: I would hope so, and hopefully it gets
15 contained.

16 But what I do understand is that within China, travel
17 is still restricted. There are areas of China that are still
18 under quarantine, public transportation is still impeded, and
19 as a result, we still have -- this virus there hit when people
20 had gone home for their New Year's holidays. So in China,
21 everybody disburses around the country and lots of people are
22 still in their places where they were.

23 We understand that about less than half of the
24 workforce for ZHP has been able to return to work. That, you
25 know, they're not still fully operable, and we're trying to

1 get an understanding as to whether one of the -- one of the
2 challenging factors for us is that our document collection
3 people are also over there in Hong Kong and Mainland China and
4 we have offices at Shanghai, too, that are at issue.

5 So trying to get a handle on when we can start --

6 THE COURT: You're talking about your law office?

7 MR. GOLDBERG: No, no, no. ZHP's. Some of the
8 operations are in Shanghai and our document collection vendor
9 is over there as well. And so we're trying to get a handle on
10 when we can start, you know, that collection. But at this
11 point, they're not operable, they don't have the right
12 functionality and it's, you know, it's obviously evolving
13 every day.

14 THE COURT: Well, do your best and can you please
15 keep us updated?

16 MR. GOLDBERG: Yes.

17 THE COURT: Okay. I think those are all the items on
18 the letters and the agenda. For the good of the order, are
19 there any other issues that anybody else wants to raise today?
20 The floor is open.

21 Okay. Hearing nothing, we'll put everything we
22 discussed today on the record in an order. We'll have the
23 phone call I think on March 11 and the meeting on March 25th,
24 and we're adjourned. Thank you.

25 THE DEPUTY CLERK: All rise.

1 (3:10 p.m.)

2 - - - - -

3

4 I certify that the foregoing is a correct transcript
5 from the record of proceedings in the above-entitled matter.

6

7 /S/ Karen Friedlander, CRR, RMR
8 Court Reporter/Transcriber

9 February 28, 2020
10 Date

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

<u>/</u>	<u>30</u> [1] - 2:4 <u>300</u> [1] - 2:16 <u>30327</u> [1] - 2:11 <u>328</u> [1] - 29:1 <u>3333</u> [1] - 2:10 <u>34</u> [3] - 9:18, 9:20, 12:19 <u>38th</u> [1] - 2:7 <u>3:10</u> [1] - 31:1	<u>addressed</u> [2] - 5:6, 14:1 <u>adequately</u> [2] - 5:16, 14:1 <u>adjoined</u> [1] - 30:24 <u>administrative</u> [1] - 22:8 <u>advance</u> [3] - 14:21, 15:13, 20:11 <u>affected</u> [1] - 11:1 <u>affidavit</u> [3] - 16:3, 17:17, 18:5 <u>affidavits</u> [10] - 16:7, 16:11, 16:14, 16:24, 17:3, 17:9, 18:7, 18:8, 19:24 <u>afraid</u> [1] - 5:13 <u>afternoon</u> [2] - 3:3, 21:15 <u>agenda</u> [9] - 4:24, 7:14, 7:16, 8:25, 9:4, 9:9, 24:18, 25:22, 30:18 <u>agendas</u> [1] - 24:17 <u>agree</u> [1] - 14:2 <u>agreed</u> [1] - 26:18 <u>agreement</u> [4] - 7:2, 8:21, 19:10, 20:1 <u>agreements</u> [5] - 9:1, 12:6, 12:10, 12:21, 12:22 <u>ahead</u> [1] - 7:21 <u>aided</u> [1] - 1:25 <u>ALFANO</u> [1] - 2:6 <u>amend</u> [3] - 24:24, 27:16, 27:18 <u>amendment</u> [2] - 24:23, 27:13 <u>Americas</u> [1] - 2:23 <u>Angeles</u> [1] - 2:17 <u>answer</u> [1] - 12:23 <u>answered</u> [1] - 23:8 <u>anticipate</u> [1] - 18:8 <u>anticipated</u> [1] - 28:22 <u>anticipating</u> [1] - 18:6 <u>anyway</u> [1] - 24:3 <u>API</u> [4] - 6:15, 7:5, 8:7, 10:18 <u>appear</u> [1] - 24:17 <u>appeared</u> [1] - 8:8 <u>applied</u> [1] - 22:19 <u>apply</u> [1] - 27:23 <u>appointed</u> [2] - 3:15, 3:17 <u>appreciate</u> [1] - 5:14 <u>appropriate</u> [3] - 18:12, 18:13, 27:20 <u>appropriately</u> [1] - 3:15 <u>area</u> [1] - 19:16	<u>areas</u> [1] - 29:17 <u>argue</u> [1] - 18:4 <u>argued</u> [1] - 17:14 <u>arguing</u> [1] - 10:12 <u>argument</u> [3] - 16:1, 16:7, 23:21 <u>arguments</u> [1] - 27:22 <u>arising</u> [2] - 12:14, 19:10 <u>assert</u> [1] - 27:19 <u>associate</u> [1] - 13:19 <u>assume</u> [1] - 20:9 <u>assuming</u> [1] - 17:1 <u>assured</u> [1] - 5:15 <u>Atlanta</u> [1] - 2:11 <u>attached</u> [1] - 23:11 <u>attempt</u> [1] - 20:15 <u>attorney</u> [1] - 26:15 <u>attorneys</u> [1] - 27:7 <u>Aurobindo</u> [5] - 2:20, 8:8, 8:10, 8:15, 9:3 <u>Aurolife</u> [1] - 2:20 <u>Aurobindo</u> [1] - 2:21 <u>available</u> [1] - 19:7 <u>Avenue</u> [1] - 2:23 <u>awaiting</u> [1] - 9:20 <u>aware</u> [1] - 7:12	<u>5:22</u> , 13:4, 14:2, 15:23, 15:24, 20:12, 20:21 <u>briefing</u> [4] - 13:13, 13:14, 18:10, 18:21 <u>briefs</u> [4] - 6:3, 13:6, 13:23, 17:7 <u>bring</u> [1] - 7:17 <u>Building</u> [1] - 1:6 <u>burden</u> [2] - 16:6, 18:4 <u>burdensomeness</u> [1] - 18:8 <u>BY</u> [9] - 1:12, 1:15, 1:18, 2:3, 2:6, 2:10, 2:13, 2:16, 2:22	
<u>0</u>	<u>07068</u> [1] - 1:13 <u>08101</u> [1] - 1:7 <u>08540</u> [1] - 2:14				
<u>1</u>	<u>10</u> [1] - 3:7 <u>10019-6022</u> [1] - 2:23 <u>103</u> [1] - 1:13 <u>11</u> [2] - 7:15, 30:23 <u>11th</u> [1] - 5:10 <u>12(b)</u> [2] - 4:15, 4:22 <u>1301</u> [1] - 2:23 <u>15219</u> [1] - 2:8 <u>16</u> [1] - 25:15 <u>17th</u> [1] - 2:4 <u>18</u> [1] - 5:3 <u>1835</u> [1] - 1:16 <u>18th</u> [3] - 5:10, 13:5 <u>19-2875</u> [1] - 3:5 <u>19103</u> [2] - 1:16, 2:4 <u>19422</u> [1] - 2:20 <u>19th</u> [1] - 22:11 <u>1:19-md-02875-RBK-JS</u> [1] - 1:4	<u>4</u> <u>450</u> [1] - 2:19 <u>4th</u> [1] - 1:6 <u>5</u> <u>5</u> [2] - 21:3 <u>7</u> <u>701</u> [1] - 1:19 <u>70130</u> [1] - 1:20 <u>756-0160</u> [1] - 1:23 <u>8</u> <u>856</u> [1] - 1:23 <u>9</u> <u>9</u> [5] - 5:3, 6:3, 13:4, 15:24, 21:12 <u>90067-2904</u> [1] - 2:17 <u>9th</u> [1] - 5:25 <u>A</u> <u>able</u> [5] - 3:8, 10:7, 15:9, 20:18, 29:24 <u>aboard</u> [2] - 6:13, 9:8 <u>above-entitled</u> [1] - 31:5 <u>ABRAHAM</u> [10] - 2:13, 6:14, 6:17, 6:21, 6:24, 7:8, 7:20, 7:24, 8:1, 8:3 <u>absolutely</u> [4] - 3:18, 18:6, 18:12, 19:18 <u>acceptable</u> [1] - 22:25 <u>accomplished</u> [2] - 3:13, 5:13 <u>according</u> [1] - 25:6 <u>ACTION</u> [1] - 1:3 <u>actual</u> [1] - 13:12 <u>ADAM</u> [1] - 1:12 <u>add</u> [2] - 8:7, 26:3 <u>additional</u> [1] - 20:2 <u>additionally</u> [1] - 18:9 <u>address</u> [4] - 13:6, 18:20, 20:5, 20:13			
<u>2</u>	<u>2</u> [4] - 21:12, 23:24, 29:1, 29:4 <u>200</u> [1] - 2:19 <u>2019</u> [1] - 28:25 <u>2020</u> [4] - 1:7, 3:2, 29:4, 31:9 <u>2029</u> [1] - 2:16 <u>21</u> [1] - 2:13 <u>23rd</u> [2] - 15:24, 28:25 <u>24</u> [1] - 5:7 <u>24-hour</u> [1] - 21:10 <u>249</u> [1] - 25:15 <u>2500</u> [1] - 2:10 <u>25th</u> [5] - 5:7, 5:8, 7:16, 20:24, 30:23 <u>26</u> [4] - 1:7, 3:2, 12:21, 13:1 <u>28</u> [1] - 31:9 <u>2900</u> [1] - 1:16 <u>2:30</u> [2] - 1:8, 3:2 <u>2nd</u> [1] - 29:7				
<u>3</u>	<u>3-20</u> [2] - 13:16, 13:18 <u>3-23</u> [2] - 13:18, 13:22		<u>B</u> <u>bad</u> [1] - 27:23 <u>ball</u> [3] - 11:25, 14:21, 15:13 <u>BARBARA</u> [1] - 2:3 <u>Barbara</u> [1] - 21:15 <u>BARNES</u> [1] - 2:15 <u>basis</u> [1] - 29:3 <u>bear</u> [1] - 28:24 <u>bearing</u> [1] - 12:12 <u>beginning</u> [1] - 11:6 <u>behalf</u> [2] - 8:19, 9:15 <u>Behram</u> [1] - 26:16 <u>believer</u> [1] - 15:18 <u>Bell</u> [1] - 2:20 <u>best</u> [5] - 7:8, 13:9, 13:10, 29:11, 30:14 <u>better</u> [1] - 20:4 <u>between</u> [4] - 11:21, 19:5, 19:6, 25:8 <u>big</u> [1] - 11:3 <u>bit</u> [1] - 12:5 <u>Blue</u> [1] - 2:20 <u>board</u> [1] - 7:18 <u>BOSICK</u> [1] - 2:6 <u>bottom</u> [2] - 26:22, 29:1 <u>box</u> [1] - 22:23 <u>boxes</u> [1] - 23:1 <u>break</u> [1] - 5:23 <u>brief</u> [9] - 4:20, 5:3,	<u>C</u> <u>CA</u> [1] - 2:17 <u>calendar</u> [2] - 5:10, 13:12 <u>Camden</u> [1] - 1:7 <u>camera</u> [3] - 16:15, 16:16, 17:21 <u>Camp</u> [1] - 1:19 <u>candid</u> [2] - 4:3, 4:5 <u>candidly</u> [1] - 5:14 <u>cannot</u> [1] - 14:2 <u>care</u> [1] - 24:25 <u>case</u> [2] [1] - 3:14, 3:16, 3:22, 3:23, 4:12, 4:21, 6:19, 6:20, 7:3, 8:8, 9:25, 10:10, 10:11, 10:16, 11:8, 12:7, 12:10, 12:14, 14:21, 19:11, 25:15 <u>cases</u> [5] - 6:8, 21:25, 22:21, 24:15, 25:9 <u>catchup</u> [1] - 7:13 <u>category</u> [1] - 17:1 <u>caught</u> [2] - 7:22, 9:7 <u>causes</u> [1] - 26:5 <u>centrality</u> [1] - 21:19 <u>Centre</u> [1] - 2:7 <u>Century</u> [1] - 2:16 <u>cert</u> [1] - 4:22 <u>certain</u> [4] - 8:24, 14:18, 15:10, 21:17 <u>certainly</u> [3] - 8:4, 19:12, 20:20 <u>certification</u> [2] - 4:16, 17:11 <u>certify</u> [1] - 31:4 <u>cetera</u> [1] - 27:23 <u>Chagares</u> [1] - 21:8 <u>chagrinned</u> [1] - 3:21 <u>chair</u> [1] - 27:9 <u>challenging</u> [1] - 30:2 <u>change</u> [1] - 21:10 <u>cheap</u> [1] - 8:5	

<p><u>checked</u> [2] - 22:23, 23:1</p> <p><u>China</u> [5] - 29:10, 29:16, 29:17, 29:20, 30:3</p> <p><u>CIPRIANI</u> [1] - 2:18</p> <p><u>CIVIL</u> [1] - 1:3</p> <p><u>clarification</u> [1] - 19:23</p> <p><u>clarified</u> [1] - 24:5</p> <p><u>CLARK</u> [1] - 1:19</p> <p><u>class</u> [3] - 4:16, 4:22, 17:11</p> <p><u>clean</u> [2] - 22:6</p> <p><u>clear</u> [1] - 4:9</p> <p><u>cleared</u> [2] - 22:4, 26:9</p> <p><u>clearly</u> [1] - 17:11</p> <p><u>CLEM</u> [1] - 2:6</p> <p><u>CLERK</u> [2] - 3:1, 30:25</p> <p><u>client</u> [4] - 18:5, 18:8, 20:19, 29:10</p> <p><u>clients</u> [3] - 7:12, 14:19, 15:17</p> <p><u>close</u> [2] - 11:2, 15:7</p> <p><u>CMO-16</u> [1] - 24:16</p> <p><u>Co</u> [1] - 2:17</p> <p><u>Cohen</u> [1] - 1:6</p> <p><u>COHEN</u> [1] - 2:10</p> <p><u>collection</u> [3] - 30:2, 30:8, 30:10</p> <p><u>coming</u> [1] - 4:10</p> <p><u>Commencing</u> [1] - 1:8</p> <p><u>committee</u> [1] - 21:9</p> <p><u>communicated</u> [1] - 14:22</p> <p><u>communication</u> [1] - 7:9</p> <p><u>company</u> [2] - 8:13, 19:17</p> <p><u>company's</u> [1] - 11:4</p> <p><u>Complaint</u> [1] - 27:13</p> <p><u>Complaints</u> [1] - 21:13</p> <p><u>complaints</u> [4] - 21:18, 21:21, 21:24, 22:13</p> <p><u>completed</u> [1] - 28:20</p> <p><u>computer</u> [1] - 1:25</p> <p><u>computer-aided</u> [1] - 1:25</p> <p><u>concern</u> [2] - 11:10, 19:13</p> <p><u>concerned</u> [3] - 16:11, 17:24, 28:9</p> <p><u>confer</u> [2] - 19:2, 20:15</p> <p><u>conference</u> [8] - 5:5, 5:9, 5:11, 22:5, 25:23, 26:1, 27:6,</p>	<p>27:11</p> <p><u>CONFERENCE</u> [1] - 1:5</p> <p><u>conferred</u> [2] - 6:25, 8:12</p> <p><u>conferring</u> [1] - 7:10</p> <p><u>confident</u> [1] - 5:17</p> <p><u>confidential</u> [1] - 11:16</p> <p><u>confirm</u> [1] - 6:6</p> <p><u>confirmation</u> [1] - 14:11</p> <p><u>CONLEE</u> [1] - 1:18</p> <p><u>Conlee</u> [1] - 13:25</p> <p><u>consensus</u> [2] - 4:11, 4:12</p> <p><u>consider</u> [1] - 13:21</p> <p><u>considering</u> [1] - 15:11</p> <p><u>consultant</u> [2] - 16:11, 17:25</p> <p><u>contained</u> [1] - 29:15</p> <p><u>contaminated</u> [2] - 10:13, 10:14</p> <p><u>continue</u> [5] - 4:4, 4:11, 9:23, 10:7, 14:3</p> <p><u>CONTINUED</u> [1] - 2:1</p> <p><u>conversation</u> [2] - 11:22, 14:16</p> <p><u>Cooper</u> [1] - 1:6</p> <p><u>cooperative</u> [1] - 8:16</p> <p><u>core</u> [2] - 7:1, 8:22</p> <p><u>Corporation</u> [1] - 16:2</p> <p><u>correct</u> [3] - 17:13, 18:16, 31:4</p> <p><u>counsel</u> [14] - 3:7, 3:15, 3:17, 3:19, 5:14, 20:7, 23:18, 24:4, 24:8, 25:8, 25:19</p> <p><u>counterproposals</u> [1] - 26:19</p> <p><u>country</u> [1] - 29:21</p> <p><u>counts</u> [1] - 26:20</p> <p><u>couple</u> [1] - 9:17</p> <p><u>course</u> [2] - 16:25, 19:14</p> <p><u>COURT</u> [2] - 1:1, 3:2</p> <p><u>Court</u> [3] - 1:22, 26:14, 31:7</p> <p><u>Court's</u> [4] - 3:11, 3:22, 10:15, 23:17</p> <p><u>Courthouse</u> [1] - 1:6</p> <p><u>CRR</u> [1] - 31:7</p> <p><u>CV</u> [3] - 16:14, 16:16, 17:20</p> <p><u>CVS</u> [1] - 2:17</p>	<p><u>D</u></p> <p><u>D'Lesli</u> [1] - 15:25</p> <p><u>D'LESli</u> [1] - 2:22</p> <p><u>date</u> [6] - 5:8, 6:22, 7:1, 7:22, 25:20, 27:19</p> <p><u>Date</u> [1] - 31:9</p> <p><u>dates</u> [1] - 28:16</p> <p><u>DAVIS</u> [19] - 2:22, 15:25, 16:17, 16:20, 16:23, 17:5, 17:13, 17:16, 17:22, 18:3, 18:6, 18:14, 18:18, 19:1, 19:12, 19:20, 19:23, 20:6, 20:14</p> <p><u>Davis</u> [1] - 15:25</p> <p><u>days</u> [1] - 27:8</p> <p><u>deadline</u> [2] - 13:13, 28:10</p> <p><u>deadlines</u> [2] - 7:11, 8:23</p> <p><u>deal</u> [2] - 11:4, 26:2</p> <p><u>December</u> [1] - 28:25</p> <p><u>decide</u> [3] - 7:6, 27:15, 27:22</p> <p><u>decided</u> [3] - 4:15, 4:16, 27:14</p> <p><u>decides</u> [1] - 6:10</p> <p><u>decision</u> [2] - 4:14, 5:4</p> <p><u>deems</u> [1] - 17:12</p> <p><u>defendant</u> [2] - 9:19, 22:17</p> <p><u>Defendant</u> [6] - 2:5, 2:8, 2:11, 2:14, 2:17, 2:20</p> <p><u>defendant's</u> [1] - 29:2</p> <p><u>defendants</u> [22] - 4:19, 5:3, 5:6, 9:16, 10:12, 11:11, 14:6, 15:1, 15:5, 15:6, 15:10, 16:15, 17:15, 17:23, 21:16, 22:12, 22:18, 25:17, 25:22, 26:19, 26:21, 27:1</p> <p><u>defendants'</u> [5] - 25:8, 27:18, 27:19, 27:25, 28:2</p> <p><u>defense</u> [2] - 13:14, 16:21</p> <p><u>Defense</u> [3] - 2:5, 2:8, 2:11</p> <p><u>defenses</u> [2] - 27:20, 27:25</p> <p><u>deficiency</u> [5] - 23:15, 24:1, 24:7, 24:24, 25:18</p> <p><u>defined</u> [1] - 20:3</p> <p><u>definition</u> [1] - 9:25</p>	<p><u>DEPUTY</u> [2] - 3:1, 30:25</p> <p><u>designate</u> [2] - 11:16, 17:25</p> <p><u>destruction</u> [1] - 12:1</p> <p><u>details</u> [1] - 14:2</p> <p><u>DFS</u> [1] - 9:21</p> <p><u>difference</u> [1] - 11:21</p> <p><u>different</u> [4] - 3:22, 10:17, 14:23, 24:22</p> <p><u>direct</u> [1] - 4:18</p> <p><u>disburses</u> [1] - 29:21</p> <p><u>disclaimer</u> [2] - 26:22, 26:23</p> <p><u>disclosed</u> [1] - 17:17</p> <p><u>discovery</u> [12] - 7:1, 8:16, 8:22, 9:13, 9:18, 9:20, 10:21, 14:15, 14:23, 16:18, 19:4</p> <p><u>discuss</u> [8] - 8:23, 8:24, 10:7, 11:19, 12:2, 14:24, 15:1, 19:23</p> <p><u>discussed</u> [6] - 4:2, 5:19, 7:7, 10:10, 18:19, 30:22</p> <p><u>discussing</u> [5] - 5:13, 12:11, 14:25, 16:5, 19:1</p> <p><u>discussion</u> [2] - 10:20, 19:24</p> <p><u>discussions</u> [4] - 4:5, 4:6, 11:2, 15:5</p> <p><u>dispensed</u> [1] - 23:2</p> <p><u>disproportionality</u> [1] - 18:9</p> <p><u>dispute</u> [5] - 25:4, 25:21, 25:22, 25:25, 27:3</p> <p><u>disputes</u> [4] - 23:9, 25:2, 25:7, 26:2</p> <p><u>distinction</u> [2] - 19:5, 19:6</p> <p><u>DISTRICT</u> [2] - 1:1, 1:1</p> <p><u>Docket</u> [3] - 3:4, 25:15, 28:25</p> <p><u>document</u> [11] - 7:3, 11:3, 11:4, 11:6, 12:1, 19:8, 19:13, 19:15, 19:16, 30:2, 30:8</p> <p><u>documents</u> [21] - 10:22, 11:11, 11:12, 11:22, 11:23, 14:18, 15:7, 15:8, 15:13, 18:10, 19:5, 19:6, 19:7, 20:8, 20:9, 20:10, 20:16, 20:23,</p>	<p>27:1, 29:2, 29:3</p> <p><u>Doe</u> [1] - 22:18</p> <p><u>done</u> [3] - 14:24, 25:23, 27:10</p> <p><u>downstream</u> [1] - 9:12</p> <p><u>dozen</u> [1] - 22:16</p> <p><u>drafts</u> [1] - 14:23</p> <p><u>drugs</u> [1] - 18:25</p> <p><u>DUANE</u> [1] - 2:2</p> <p><u>due</u> [1] - 5:24</p>
<p><u>E</u></p> <p><u>e-filing</u> [1] - 21:11</p> <p><u>e-mail</u> [1] - 26:22</p> <p><u>early</u> [3] - 10:20, 12:18, 15:16</p> <p><u>East</u> [1] - 2:16</p> <p><u>Eastern</u> [2] - 21:4, 21:7</p> <p><u>eastern</u> [1] - 21:6</p> <p><u>easy</u> [1] - 10:11</p> <p><u>Economic</u> [1] - 27:13</p> <p><u>edits</u> [1] - 9:20</p> <p><u>effect</u> [1] - 27:17</p> <p><u>Eisenhower</u> [1] - 1:13</p> <p><u>either</u> [4] - 9:3, 13:12, 22:17, 25:4</p> <p><u>elapsed</u> [1] - 23:15</p> <p><u>encourage</u> [1] - 15:14</p> <p><u>encouraged</u> [1] - 14:7</p> <p><u>end</u> [4] - 5:5, 9:5, 22:22, 26:1</p> <p><u>enter</u> [1] - 27:16</p> <p><u>entered</u> [3] - 26:5, 26:10, 28:2</p> <p><u>entitled</u> [1] - 31:5</p> <p><u>entity</u> [2] - 8:11, 10:23</p> <p><u>equal</u> [1] - 13:14</p> <p><u>ERIC</u> [1] - 2:13</p> <p><u>ESI</u> [4] - 7:3, 26:12, 28:6, 29:4</p> <p><u>especially</u> [1] - 4:13</p> <p><u>ESQ</u> [1] - 2:3</p> <p><u>ESQUIRE</u> [12] - 1:12, 1:15, 1:18, 1:19, 2:3, 2:6, 2:7, 2:10, 2:13, 2:16, 2:19, 2:22</p> <p><u>establish</u> [1] - 7:12</p> <p><u>established</u> [1] - 7:11</p> <p><u>establishes</u> [1] - 29:12</p> <p><u>et</u> [1] - 27:23</p> <p><u>evidence</u> [1] - 16:3</p> <p><u>evolving</u> [1] - 30:12</p> <p><u>exact</u> [1] - 8:23</p> <p><u>exactly</u> [1] - 19:22</p> <p><u>example</u> [2] - 17:8, 23:24</p> <p><u>except</u> [1] - 29:8</p>				

<p><u>exceptional</u> [1] - 3:17</p> <p><u>exemplar</u> [4] - 15:7, 15:13, 18:10, 20:8</p> <p><u>Exhibit</u> [11] - 21:20, 21:25, 22:1, 22:13, 22:22, 23:4, 23:5, 23:12, 23:24, 24:15, 26:5</p> <p><u>exhibit</u> [2] - 21:23, 21:25</p> <p><u>exist</u> [3] - 11:13, 11:23, 12:15</p> <p><u>existed</u> [3] - 11:12, 11:25, 19:7</p> <p><u>exists</u> [1] - 17:19</p> <p><u>expectation</u> [1] - 18:14</p> <p><u>experience</u> [1] - 15:15</p> <p><u>expert</u> [5] - 16:10, 17:17, 17:19, 17:25, 18:7</p> <p><u>experts</u> [2] - 16:8, 17:9</p> <p><u>explain</u> [1] - 22:23</p> <p><u>exploring</u> [1] - 21:10</p> <p><u>extent</u> [1] - 5:1</p>	<p>20:12, 23:10, 23:12, 23:19, 24:14, 24:18, 24:22, 26:6, 29:3, 29:5</p> <p><u>five</u> [4] - 4:20, 5:22, 6:3, 6:5</p> <p><u>five-page</u> [3] - 4:20, 5:22, 6:3</p> <p><u>fixed</u> [2] - 21:21, 21:22</p> <p><u>Floor</u> [1] - 2:7</p> <p><u>floor</u> [1] - 30:20</p> <p><u>focus</u> [3] - 10:14, 11:7, 19:21</p> <p><u>followed</u> [1] - 23:9</p> <p><u>following</u> [1] - 24:23</p> <p><u>follows</u> [1] - 4:18</p> <p><u>FOR</u> [1] - 1:1</p> <p><u>foregoing</u> [1] - 31:4</p> <p><u>Form</u> [1] - 21:13</p> <p><u>form</u> [4] - 14:15, 21:17, 21:23, 22:13</p> <p><u>former</u> [1] - 19:8</p> <p><u>forth</u> [3] - 11:1, 12:5, 14:5</p> <p><u>four</u> [1] - 5:12</p> <p><u>FREEMAN</u> [1] - 1:12</p> <p><u>Friday</u> [1] - 13:22</p> <p><u>Friedlander</u> [2] - 1:22, 31:7</p> <p><u>friedlanderreporter@gmail.com</u> [1] - 1:23</p> <p><u>friend</u> [1] - 7:8</p> <p><u>front</u> [1] - 28:14</p> <p><u>fruit</u> [1] - 18:24</p> <p><u>FULBRIGHT</u> [1] - 2:22</p> <p><u>Fulbright</u> [1] - 15:25</p> <p><u>fully</u> [1] - 29:25</p> <p><u>functional</u> [1] - 19:16</p> <p><u>functionality</u> [1] - 30:12</p> <p><u>futility</u> [2] - 27:15, 27:22</p> <p><u>future</u> [3] - 4:21, 6:11, 15:17</p>	<p><u>GOLOMB</u> [1] - 1:15</p> <p><u>GORDON</u> [1] - 2:6</p> <p><u>granted</u> [1] - 27:18</p> <p><u>granular</u> [1] - 26:25</p> <p><u>great</u> [6] - 3:14, 8:9, 14:17, 15:3, 15:12, 26:8</p> <p><u>GREENBERG</u> [1] - 2:9</p> <p><u>Group</u> [3] - 2:5, 2:8, 2:11</p> <p><u>group</u> [8] - 11:11, 14:19, 16:21, 24:22, 24:24, 25:1, 29:3</p> <p><u>groups</u> [1] - 24:22</p> <p><u>guess</u> [2] - 7:9, 25:11</p>	<p><u>hope</u> [5] - 3:20, 4:11, 22:4, 27:10, 29:14</p> <p><u>hopefully</u> [4] - 4:5, 7:2, 7:7, 29:14</p> <p><u>hours</u> [1] - 5:12</p> <p><u>hypothetically</u> [1] - 17:8</p>	<p>16:9, 16:15, 22:7, 22:8, 22:15, 22:24, 23:4, 23:10, 25:11, 26:12, 27:15, 28:4, 28:6, 28:23, 30:4</p> <p><u>issued</u> [2] - 22:10, 24:18</p> <p><u>issues</u> [30] - 4:15, 4:25, 5:4, 5:24, 7:17, 9:2, 9:13, 9:21, 10:7, 10:10, 11:8, 12:3, 12:11, 12:14, 13:6, 13:21, 14:1, 15:9, 15:15, 15:23, 16:18, 18:7, 18:18, 19:25, 21:24, 22:16, 25:13, 26:17, 26:25, 30:19</p> <p><u>item</u> [1] - 15:6</p> <p><u>items</u> [1] - 30:17</p>
<p>F</p> <p><u>fact</u> [7] - 4:1, 9:19, 17:16, 23:7, 23:12, 23:25, 25:17</p> <p><u>factors</u> [1] - 30:2</p> <p><u>fair</u> [1] - 13:24</p> <p><u>faith</u> [1] - 27:23</p> <p><u>faithfully</u> [1] - 3:19</p> <p><u>false</u> [1] - 26:17</p> <p><u>far</u> [2] - 14:13, 14:24</p> <p><u>feasible</u> [1] - 5:8</p> <p><u>February</u> [4] - 1:7, 3:2, 22:11, 31:9</p> <p><u>feet</u> [1] - 23:3</p> <p><u>few</u> [2] - 5:23, 13:9</p> <p><u>figure</u> [1] - 12:2</p> <p><u>file</u> [1] - 27:24</p> <p><u>filed</u> [3] - 5:24, 21:18, 21:23</p> <p><u>Filed</u> [1] - 21:12</p> <p><u>filing</u> [4] - 20:2, 20:20, 21:11</p> <p><u>final</u> [1] - 19:23</p> <p><u>fine</u> [7] - 7:15, 16:8, 16:16, 17:15, 17:16, 20:25, 27:12</p> <p><u>finish</u> [1] - 12:16</p> <p><u>fire</u> [1] - 23:3</p> <p><u>firm</u> [2] - 3:11, 15:18</p> <p><u>firms</u> [2] - 22:24, 24:14</p> <p><u>first</u> [12] - 4:23, 9:12,</p>	<p>G</p> <p><u>gap</u> [1] - 15:8</p> <p><u>generally</u> [4] - 9:13, 9:14, 10:2, 11:22</p> <p><u>Georgia</u> [1] - 2:11</p> <p><u>given</u> [2] - 23:18, 24:5</p> <p><u>glad</u> [1] - 7:17</p> <p><u>goal</u> [1] - 18:17</p> <p><u>GOLDBERG</u> [8] - 2:3, 5:20, 5:22, 6:2, 29:11, 29:14, 30:7, 30:16</p> <p><u>goldberg's</u> [1] - 9:12</p>	<p>H</p> <p><u>half</u> [2] - 22:16, 29:23</p> <p><u>handful</u> [1] - 21:20</p> <p><u>handle</u> [2] - 30:5, 30:9</p> <p><u>hanging</u> [1] - 18:23</p> <p><u>happy</u> [2] - 8:25, 18:20</p> <p><u>hard</u> [1] - 11:18</p> <p><u>head</u> [2] - 7:17, 21:8</p> <p><u>Health</u> [1] - 2:17</p> <p><u>hear</u> [1] - 18:21</p> <p><u>hearing</u> [2] - 18:16, 30:21</p> <p><u>HEINZ</u> [4] - 2:19, 8:14, 8:17, 8:23</p> <p><u>Heinz</u> [1] - 8:10</p> <p><u>help</u> [2] - 15:12, 29:9</p> <p><u>hesitation</u> [1] - 3:18</p> <p><u>Hetero</u> [9] - 2:14, 6:13, 6:19, 6:22, 7:6, 7:17, 7:18, 7:22, 9:2</p> <p><u>hide</u> [1] - 11:24</p> <p><u>high</u> [1] - 26:20</p> <p><u>HILL</u> [1] - 2:12</p> <p><u>Hilton</u> [3] - 7:9, 8:6, 8:18</p> <p><u>HILTON</u> [5] - 1:19, 8:6, 8:10, 9:6, 26:15</p> <p><u>hit</u> [3] - 26:20, 26:23, 29:19</p> <p><u>hold</u> [1] - 23:3</p> <p><u>holidays</u> [1] - 29:20</p> <p><u>home</u> [1] - 29:20</p> <p><u>Hong</u> [1] - 30:3</p> <p><u>HONIK</u> [2] - 1:15, 1:15</p> <p><u>Honor</u> [19] - 5:20, 8:6, 9:6, 9:15, 10:19, 13:8, 13:25, 15:21, 17:18, 18:3, 20:6, 20:7, 21:15, 22:3, 23:11, 25:12, 26:15, 28:4, 29:11</p> <p><u>HONORABLE</u> [1] - 1:9</p>	<p>I</p> <p><u>idea</u> [3] - 14:18, 15:12, 19:24</p> <p><u>identified</u> [3] - 9:21, 22:12, 22:15</p> <p><u>identifying</u> [2] - 22:17</p> <p><u>identity</u> [2] - 16:12, 18:2</p> <p><u>imagine</u> [1] - 25:12</p> <p><u>impeded</u> [1] - 29:18</p> <p><u>important</u> [1] - 4:15</p> <p><u>improperly</u> [1] - 21:18</p> <p><u>Improvidentally</u> [1] - 21:12</p> <p><u>IN</u> [1] - 1:3</p> <p><u>in-person</u> [3] - 5:4, 5:9, 25:23</p> <p><u>Inc</u> [1] - 2:20</p> <p><u>included</u> [1] - 23:14</p> <p><u>indemnification</u> [4] - 12:6, 12:13, 12:22, 19:10</p> <p><u>indemnifications</u> [1] - 12:10</p> <p><u>Indian</u> [1] - 8:11</p> <p><u>indication</u> [1] - 28:8</p> <p><u>indications</u> [1] - 28:10</p> <p><u>individual</u> [3] - 24:8, 25:18, 27:1</p> <p><u>individually</u> [2] - 2:24, 16:2</p> <p><u>inform</u> [1] - 19:3</p> <p><u>informally</u> [1] - 14:13</p> <p><u>information</u> [3] - 14:12, 17:10, 25:5</p> <p><u>insignificant</u> [1] - 22:24</p> <p><u>instances</u> [1] - 26:21</p> <p><u>insurance</u> [2] - 12:20, 12:25</p> <p><u>intent</u> [1] - 28:11</p> <p><u>interest</u> [1] - 27:7</p> <p><u>interests</u> [4] - 3:16, 3:25, 4:1, 5:16</p> <p><u>invested</u> [1] - 15:19</p> <p><u>invitations</u> [1] - 23:4</p> <p><u>invite</u> [1] - 22:21</p> <p><u>Irbesartan</u> [1] - 27:4</p> <p><u>issue</u> [24] - 4:22, 7:7, 9:12, 9:24, 11:5, 11:16, 12:10, 12:17,</p>	<p>J</p> <p><u>January</u> [1] - 21:17</p> <p><u>JASON</u> [1] - 2:7</p> <p><u>JERSEY</u> [1] - 1:1</p> <p><u>Jersey</u> [2] - 1:7, 1:13</p> <p><u>JESSICA</u> [1] - 2:19</p> <p><u>job</u> [1] - 28:22</p> <p><u>JOEL</u> [1] - 1:9</p> <p><u>John</u> [1] - 22:18</p> <p><u>JOHNSON</u> [5] - 10:1, 10:6, 10:19, 11:5, 12:8</p> <p><u>Johnston</u> [5] - 9:15, 14:17, 18:20, 19:1, 19:13</p> <p><u>JOHNSTON</u> [11] - 2:16, 9:15, 11:19, 12:17, 12:24, 13:8, 13:17, 13:20, 13:24, 14:22, 15:21</p> <p><u>Joint</u> [3] - 2:5, 2:8, 2:11</p> <p><u>joint</u> [1] - 16:21</p> <p><u>JUDGE</u> [1] - 1:9</p> <p><u>Judge</u> [5] - 4:13, 6:4, 6:10, 6:14, 21:8</p> <p><u>judicial</u> [1] - 21:8</p>
				<p>K</p> <p><u>KANNER</u> [1] - 1:18</p> <p><u>Karen</u> [2] - 1:22, 31:7</p> <p><u>KATZ</u> [1] - 1:12</p> <p><u>keep</u> [3] - 5:8, 14:12, 30:15</p> <p><u>key</u> [1] - 11:9</p> <p><u>knowledgeable</u> [1] - 16:8</p> <p><u>known</u> [1] - 4:8</p>

<u>Kong</u> ^[1] - 30:3 <u>Kugler</u> ^[3] - 4:13, 6:4, 6:10	<u>look</u> ^[2] - 7:4, 13:10 <u>looked</u> ^[1] - 21:11 <u>looking</u> ^[5] - 11:9, 13:11, 14:8, 25:14, 28:25 <u>LORI</u> ^[1] - 2:10 <u>Los</u> ^[1] - 2:17 <u>losartan</u> ^[1] - 27:4 <u>Loss</u> ^[1] - 27:13 <u>Louisiana</u> ^[1] - 1:20 <u>low</u> ^[1] - 18:23 <u>low-hanging</u> ^[1] - 18:23 <u>Ltd</u> ^[2] - 2:14, 2:21	<u>minutes</u> ^[1] - 5:23 <u>miss</u> ^[1] - 14:17 <u>Miss</u> ^[4] - 7:8, 8:10, 8:18, 15:1 <u>Mitchell</u> ^[1] - 1:6 <u>model</u> ^[1] - 17:10 <u>moment</u> ^[1] - 28:24 <u>Monday</u> ^[3] - 5:25, 8:12, 9:19 <u>money</u> ^[1] - 15:16 <u>month</u> ^[2] - 9:5, 29:6 <u>monthly</u> ^[1] - 5:11 <u>morning</u> ^[4] - 3:7, 4:9, 7:4, 20:24 <u>MORRIS</u> ^[1] - 2:2 <u>motion</u> ^[3] - 27:16, 27:21, 27:24 <u>motions</u> ^[2] - 4:15, 4:22 <u>move</u> ^[1] - 13:13 <u>MR</u> ^[26] - 5:20, 5:22, 6:2, 6:14, 6:17, 6:21, 6:24, 7:8, 7:20, 7:24, 8:1, 8:3, 20:7, 21:1, 21:4, 21:6, 23:23, 24:21, 25:10, 27:6, 28:3, 28:18, 29:11, 29:14, 30:7, 30:16 <u>MS</u> ^[56] - 8:6, 8:10, 8:14, 8:17, 8:23, 9:6, 9:15, 10:1, 10:6, 10:19, 11:5, 11:19, 12:8, 12:17, 12:24, 13:8, 13:17, 13:20, 13:24, 13:25, 14:22, 15:4, 15:20, 15:21, 15:25, 16:17, 16:20, 16:23, 17:5, 17:13, 17:16, 17:22, 18:3, 18:6, 18:14, 18:18, 19:1, 19:12, 19:20, 19:23, 20:6, 20:14, 21:15, 22:3, 22:10, 23:6, 23:11, 23:20, 24:7, 24:12, 24:16, 25:14, 26:3, 26:7, 26:11, 26:15 <u>must</u> ^[1] - 24:16 <u>Mylan</u> ^[1] - 2:8	<u>need</u> ^[10] - 7:15, 11:14, 11:19, 13:5, 16:3, 16:7, 17:10, 18:5, 20:22, 26:5 <u>needed</u> ^[1] - 19:15 <u>needing</u> ^[1] - 16:25 <u>negotiating</u> ^[2] - 9:18, 26:16 <u>negotiations</u> ^[1] - 14:5 <u>never</u> ^[1] - 19:6 <u>NEW</u> ^[1] - 1:1 <u>new</u> ^[1] - 7:8 <u>New</u> ^[5] - 1:7, 1:13, 1:20, 2:23, 29:20 <u>newly</u> ^[1] - 20:23 <u>next</u> ^[7] - 18:15, 20:2, 22:5, 25:21, 25:23, 26:12, 27:10 <u>night's</u> ^[1] - 21:2 <u>nilly</u> ^[1] - 23:1 <u>NJ</u> ^[1] - 2:14 <u>non</u> ^[1] - 18:25 <u>non-recalled</u> ^[1] - 18:25 <u>none</u> ^[3] - 5:17, 27:23, 28:7 <u>nonparticipants</u> ^[1] - 5:18 <u>NORTON</u> ^[1] - 2:22 <u>Norton</u> ^[1] - 15:25 <u>note</u> ^[2] - 28:1, 28:12 <u>notebooks</u> ^[1] - 28:15 <u>nothing</u> ^[2] - 3:12, 30:21 <u>notice</u> ^[1] - 22:23, 23:5, 23:15, 23:16, 23:19, 23:20, 24:1, 24:5, 24:6, 24:24, 25:18 <u>notices</u> ^[1] - 24:8 <u>notified</u> ^[1] - 23:10 <u>notifying</u> ^[1] - 25:18 <u>NUMBER</u> ^[1] - 1:3 <u>number</u> ^[3] - 12:8, 12:25, 14:23 <u>NY</u> ^[1] - 2:23	<u>4:4</u> <u>office</u> ^[1] - 30:6 <u>offices</u> ^[1] - 30:4 <u>Official</u> ^[1] - 1:22 <u>once</u> ^[1] - 15:15 <u>One</u> ^[1] - 2:7 <u>one</u> ^[8] - 11:13, 11:25, 14:4, 20:7, 28:4, 28:24, 30:1 <u>one's</u> ^[1] - 4:1 <u>ones</u> ^[2] - 18:20, 20:2 <u>open</u> ^[1] - 30:20 <u>OPEN</u> ^[1] - 3:2 <u>opened</u> ^[1] - 3:12 <u>opening</u> ^[1] - 5:2 <u>operable</u> ^[2] - 29:25, 30:11 <u>operations</u> ^[1] - 30:8 <u>opinion</u> ^[1] - 3:11 <u>opportunity</u> ^[1] - 18:22 <u>order</u> ^[24] - 7:4, 22:5, 22:10, 22:18, 23:17, 24:3, 24:10, 24:14, 24:17, 24:19, 25:3, 25:7, 25:14, 25:16, 26:5, 27:16, 28:1, 28:2, 28:11, 28:14, 28:15, 28:25, 30:18, 30:22 <u>Order</u> ^[1] - 25:15 <u>ordered</u> ^[4] - 21:17, 21:21, 26:14, 29:2 <u>orders</u> ^[2] - 22:1, 25:19 <u>Orleans</u> ^[1] - 1:20 <u>OSC</u> ^[1] - 26:9 <u>outlined</u> ^[1] - 18:18 <u>outset</u> ^[1] - 10:3 <u>outstanding</u> ^[1] - 22:14 <u>overidentification</u> ^[1] - 22:7 <u>overidentifying</u> ^[1] - 22:12 <u>owe</u> ^[1] - 8:19 <u>Oxford</u> ^[1] - 2:7
<p style="text-align: center;"><u>L</u></p> <u>Labs</u> ^[1] - 2:14 <u>language</u> ^[2] - 26:22, 26:23 <u>large</u> ^[1] - 3:23 <u>last</u> ^[4] - 9:17, 14:25, 21:2, 27:7 <u>lateness</u> ^[1] - 27:23 <u>latest</u> ^[1] - 9:19 <u>law</u> ^[1] - 30:6 <u>lawyers</u> ^[1] - 22:21 <u>Layne</u> ^[1] - 8:6 <u>LAYNE</u> ^[1] - 1:19 <u>lays</u> ^[1] - 25:16 <u>leadership</u> ^[4] - 3:7, 3:11, 24:4, 27:5 <u>least</u> ^[3] - 3:9, 10:12, 23:15 <u>leave</u> ^[1] - 27:18 <u>leaves</u> ^[1] - 19:9 <u>left</u> ^[2] - 7:19, 21:14 <u>legal</u> ^[1] - 11:24 <u>less</u> ^[1] - 29:23 <u>letter</u> ^[13] - 4:20, 5:2, 5:22, 6:3, 9:12, 13:5, 14:20, 17:7, 18:10, 20:1, 20:21, 25:20, 28:5 <u>letters</u> ^[4] - 9:10, 14:23, 21:2, 30:18 <u>liabilities</u> ^[1] - 19:10 <u>LIABILITY</u> ^[1] - 1:4 <u>liability</u> ^[1] - 12:14 <u>liaison</u> ^[6] - 3:15, 3:17, 3:18, 23:18, 24:4, 25:19 <u>Limited</u> ^[1] - 8:10 <u>list</u> ^[7] - 14:9, 21:20, 22:14, 23:14, 24:6, 25:1, 26:2 <u>listed</u> ^[2] - 24:14, 24:15 <u>listen</u> ^[1] - 3:9 <u>listing</u> ^[5] - 21:23, 23:12, 24:18, 26:6, 26:9 <u>litigation</u> ^[2] - 10:24, 12:4 <u>LITIGATION</u> ^[1] - 1:4 <u>live</u> ^[1] - 3:9 <u>LLC</u> ^[3] - 1:12, 1:18, 2:21 <u>LLP</u> ^[5] - 2:2, 2:6, 2:9, 2:12, 2:15 <u>loaded</u> ^[1] - 21:18	<p style="text-align: center;"><u>M</u></p> <u>macro</u> ^[6] - 4:25, 9:13, 16:18, 17:1, 18:7, 19:24 <u>MAGISTRATE</u> ^[1] - 1:9 <u>mail</u> ^[1] - 26:22 <u>Mainland</u> ^[1] - 30:3 <u>managed</u> ^[1] - 4:21 <u>management</u> ^[2] - 4:12, 25:15 <u>manufactured</u> ^[1] - 10:23 <u>manufacturer</u> ^[2] - 6:16, 8:8 <u>manufacturers</u> ^[3] - 7:5, 10:23, 10:25 <u>March</u> ^[24] - 5:3, 5:5, 5:7, 5:8, 5:10, 5:25, 6:3, 7:15, 7:16, 13:4, 13:5, 15:24, 22:12, 22:22, 26:1, 29:4, 29:7, 30:23 <u>Market</u> ^[1] - 1:16 <u>marketing</u> ^[1] - 10:4 <u>Master</u> ^[1] - 27:13 <u>matter</u> ^[2] - 4:23, 31:5 <u>MAZIE</u> ^[1] - 1:12 <u>McKesson</u> ^[2] - 2:24, 16:2 <u>MDL</u> ^[2] - 21:18, 23:3 <u>meantime</u> ^[1] - 22:15 <u>mechanical</u> ^[1] - 1:24 <u>meet</u> ^[2] - 19:2, 20:14 <u>meeting</u> ^[7] - 3:12, 3:21, 4:10, 5:7, 7:16, 9:4, 30:23 <u>mention</u> ^[1] - 28:4 <u>message</u> ^[1] - 7:18 <u>met</u> ^[4] - 3:6, 6:25, 7:7, 8:12 <u>mid</u> ^[2] - 21:17, 22:12 <u>mid-March</u> ^[1] - 22:12 <u>might</u> ^[1] - 17:3	<p style="text-align: center;"><u>N</u></p> <u>name</u> ^[2] - 16:14, 16:16 <u>named</u> ^[1] - 10:24 <u>narrow</u> ^[2] - 11:6, 13:9 <u>NDA</u> ^[1] - 8:20 <u>NE</u> ^[1] - 2:10 <u>necessarily</u> ^[1] - 27:17 <u>necessary</u> ^[1] - 27:21	<p style="text-align: center;"><u>O</u></p> <u>o'clock</u> ^[1] - 3:7 <u>objection</u> ^[4] - 4:8, 16:13, 27:18, 28:2 <u>objections</u> ^[2] - 16:4, 18:15 <u>obligation</u> ^[1] - 23:1 <u>obligations</u> ^[1] - 3:19 <u>obviously</u> ^[4] - 4:14, 20:14, 27:25, 30:12 <u>OF</u> ^[1] - 1:1 <u>off-the-record</u> ^[1] -	<p style="text-align: center;"><u>P</u></p> <u>P.C</u> ^[1] - 2:18 <u>p.m</u> ^[3] - 1:8, 3:2, 31:1 <u>PA</u> ^[1] - 2:20 <u>Pacific</u> ^[2] - 21:4, 21:6 <u>page</u> ^[3] - 4:20, 5:22, 6:3 <u>Page</u> ^[3] - 21:12, 23:24, 29:1 <u>pages</u> ^[2] - 6:5 <u>pains</u> ^[1] - 3:14

paragraph [2] - 13:7, 29:1
paragraphs [1] - 13:9
Parekh [1] - 26:16
Park [1] - 2:16
Parkway [2] - 1:13, 2:19
part [3] - 10:20, 14:5, 14:14
participate [2] - 3:8, 3:24
particular [2] - 11:24, 25:11
parties [1] - 26:24
past [2] - 4:3, 6:8
payoff [1] - 15:19
PC [1] - 1:15
Pennsylvania [3] - 1:16, 2:4, 2:8
penthouse [1] - 6:18
people [6] - 10:18, 16:8, 23:8, 29:19, 29:21, 30:3
percolating [1] - 9:22
perfect [4] - 3:8, 3:10, 13:17, 17:22
perfectly [2] - 16:8, 18:12
period [1] - 11:7
person [8] - 4:13, 5:4, 5:9, 14:9, 16:12, 18:1, 22:22, 25:23
person's [1] - 18:1
personal [1] - 6:7
persuasive [2] - 6:7, 6:10
pertinent [1] - 12:3
Pharma [4] - 2:20, 2:21, 8:10
Philadelphia [2] - 1:16, 2:4
phone [1] - 30:23
piece [1] - 25:21
Piedmont [1] - 2:10
PIETRAGALLO [1] - 2:6
Pittsburgh [1] - 2:8
places [1] - 29:22
plaintiff [9] - 5:2, 10:12, 12:15, 17:4, 23:10, 23:12, 24:9, 25:20, 27:18
Plaintiff [3] - 1:14, 1:17, 1:20
Plaintiff's [1] - 23:25
plaintiff's [1] - 11:10
plaintiffs [21] - 4:19, 5:23, 5:25, 7:1, 7:7, 8:7, 9:17, 10:8, 10:21, 13:3, 15:23,

16:10, 16:13, 16:24, 17:8, 17:18, 19:21, 22:11, 22:25, 24:4, 27:24
plaintiffs' [6] - 13:13, 22:21, 23:7, 23:18, 25:8, 27:4
point [6] - 6:8, 11:25, 14:10, 21:22, 23:13, 30:11
pointed [1] - 28:6
policies [9] - 11:3, 11:7, 11:14, 12:3, 12:25, 19:5, 19:8, 19:15, 19:16
policy [1] - 11:4
position [3] - 4:8, 14:19, 24:13
positions [1] - 5:15
positives [1] - 26:17
possible [1] - 7:23
potentially [1] - 25:4
prefer [2] - 10:6, 20:11
prejudice [1] - 27:19
prejudiced [2] - 4:1, 5:18
prepare [1] - 20:13
preparing [1] - 12:16
present [4] - 3:9, 4:13, 10:4, 20:5
preserved [1] - 28:1
pretty [2] - 9:16, 11:15
previewed [1] - 18:15
previous [1] - 22:8
previously [2] - 10:15, 22:11
Princeton [1] - 2:14
problem [5] - 6:1, 16:23, 17:5, 20:14
procedural [1] - 21:8
proceed [1] - 4:17
proceeded [1] - 4:9
proceeding [1] - 7:21
proceedings [1] - 31:5
Proceedings [1] - 1:24
process [7] - 16:23, 17:5, 23:9, 23:14, 25:16, 26:19, 26:24
produce [6] - 11:4, 11:16, 16:13, 17:10, 17:20, 20:11
produceable [1] - 17:12
produced [9] - 1:25, 7:1, 8:17, 12:21, 12:25, 19:15, 20:23, 29:2, 29:4
production [5] - 7:3, 10:2, 28:16, 28:19,

29:7
productions [3] - 28:6, 28:7, 29:5
PRODUCTS [1] - 1:3
progress [4] - 9:17, 9:23, 12:4, 19:2
properly [1] - 21:19
proposal [3] - 6:8, 17:7, 27:5
propose [3] - 4:21, 5:24, 13:11
proposed [4] - 16:4, 17:6, 17:17, 27:9
proposing [1] - 6:9
protect [1] - 18:1
protected [1] - 5:17
protocol [1] - 12:1
provide [3] - 21:20, 21:23, 22:14
provided [1] - 20:9
public [1] - 29:18
purposes [2] - 3:6, 17:11
pursuant [2] - 24:16, 24:19
push [1] - 13:13
put [7] - 7:14, 7:16, 8:25, 9:3, 14:15, 25:22, 30:21

Q

quarantine [1] - 29:18
questioning [1] - 24:3
questions [2] - 8:2, 27:9
quick [1] - 16:3
quote [3] - 4:25, 16:10, 17:24

R

raise [5] - 14:4, 23:9, 23:21, 28:12, 30:19
raised [1] - 16:9
RASPANTI [1] - 2:6
rather [2] - 8:25, 14:10
re [1] - 3:4
RE [1] - 1:3
reach [2] - 4:10, 4:11
reached [1] - 4:12
read [1] - 19:9
reading [1] - 13:22
realized [1] - 27:15
really [2] - 4:10, 13:21
reason [3] - 7:25, 11:24, 12:20
reasoning [1] - 10:15
reasons [1] - 12:25
recalled [6] - 10:2,

10:3, 10:11, 10:14, 18:25
receipt [1] - 25:17
received [1] - 9:19
recently [2] - 21:23, 22:10
record [7] - 3:4, 3:6, 4:2, 4:4, 4:7, 30:22, 31:5
recorded [1] - 1:24
records [1] - 11:9
redact [2] - 16:14, 16:16
REEFER [1] - 2:7
regard [2] - 19:9, 27:16
regular [1] - 7:9
reinvent [1] - 15:18
relate [1] - 26:25
related [2] - 10:22, 26:18
relates [1] - 28:5
relevance [2] - 17:1, 20:16
relevant [7] - 7:2, 7:5, 8:22, 12:7, 12:9, 17:11, 19:9
remaining [1] - 25:2
remedied [1] - 21:19
remedy [1] - 22:13
remember [1] - 8:15
reply [1] - 20:24
report [1] - 17:10
Reporter [1] - 1:22
Reporter/Transcriber [1] - 31:7
represent [2] - 3:16, 17:19
represented [1] - 6:21
representing [2] - 16:1, 16:2
represents [1] - 8:11
request [3] - 15:11, 20:7, 20:8
require [1] - 12:5
required [1] - 24:10
requires [1] - 16:24
reservation [1] - 3:18
resolve [4] - 4:25, 5:1, 10:8, 25:11
resolved [2] - 15:15, 25:22
resolving [1] - 9:23
resources [1] - 15:18
respect [1] - 5:18
respond [5] - 5:3, 13:4, 17:15, 20:22, 25:20
responded [1] - 25:5

response [1] - 14:14
responsive [1] - 29:3
rest [1] - 5:15
restricted [1] - 29:17
result [2] - 14:13, 29:19
retailer [4] - 9:13, 9:16, 14:6, 15:1
retailers [3] - 10:18, 13:4, 15:14
retention [10] - 11:3, 11:4, 11:7, 11:14, 12:3, 19:5, 19:8, 19:14, 19:15, 19:16
return [1] - 29:24
reveal [1] - 16:12
revised [1] - 26:13
revisions [1] - 9:20
RFPs [1] - 16:5
rise [2] - 3:1, 30:25
RMR [1] - 31:7
Road [2] - 2:10, 2:13
rolling [5] - 28:7, 28:16, 28:19, 29:3, 29:5
Rose [1] - 15:25
ROSE [1] - 2:22
Roseland [1] - 1:13
Roszel [1] - 2:13
rounds [1] - 9:19
row [1] - 8:3
RUBEN [1] - 1:15
rubric [1] - 12:22
Rule [6] - 4:22, 9:18, 9:20, 12:19, 12:21, 13:1
rule [2] - 21:9, 21:10
ruled [2] - 10:15, 18:15
rules [1] - 23:2
running [1] - 14:9

S

SARAH [1] - 2:16
Sarah [1] - 9:15
saves [1] - 15:16
scheduling [1] - 5:24
SCHNEIDER [1] - 1:9
Schwartz [1] - 21:16
SCHWARTZ [14] - 2:3, 21:15, 22:3, 22:10, 23:6, 23:11, 23:20, 24:7, 24:12, 24:16, 25:14, 26:3, 26:7, 26:11
scope [3] - 9:18, 10:2, 11:20
scrambling [1] - 20:19
search [4] - 26:12,

26:13, 26:16, 28:5
seat [1] - 6:18
seated [1] - 3:4
seats [1] - 8:5
second [4] - 3:25,
25:15, 26:9, 29:1
section [1] - 25:16
see [5] - 11:14, 15:8,
18:23, 19:12, 20:12
seeking [2] - 10:22,
20:16
send [2] - 14:20, 25:17
sense [2] - 13:12, 27:8
Sentry [1] - 2:19
served [4] - 23:14,
24:1, 24:7, 24:8
service [1] - 25:21
session [1] - 4:6
set [1] - 7:4
SETH [1] - 2:3
sets [2] - 15:6, 15:10
several [2] - 18:19,
27:8
shall [3] - 25:22, 29:2,
29:4
shame [2] - 22:20
Shanghai [2] - 30:4,
30:8
share [1] - 20:20
sheet [2] - 9:19, 25:17
sheets [3] - 23:7,
23:12, 23:25
shoot [1] - 6:4
short [5] - 15:19,
20:24, 21:17, 21:23,
22:13
Short [1] - 21:12
show [7] - 20:17, 22:1,
23:13, 24:14, 24:17,
25:3, 26:5
showed [1] - 27:7
shows [1] - 15:15
side [3] - 6:6, 6:7,
14:15
significant [1] - 10:25
similar [2] - 22:16,
22:18
simultaneous [1] -
4:20
single [2] - 22:17,
26:22
sit [1] - 3:21
size [1] - 3:10
slash [1] - 24:15
SLATER [12] - 1:12,
1:12, 20:7, 21:1,
21:4, 21:6, 23:23,
24:21, 25:10, 27:6,
28:3, 28:18
Slater [5] - 9:11,

20:22, 23:22, 24:9,
28:13
so-called [1] - 4:25
somewhere [1] -
11:13
soon [2] - 7:22, 14:10
sooner [1] - 8:25
sorry [2] - 21:5, 23:17
sort [2] - 7:13, 26:25
sounds [1] - 9:7
speaking [2] - 16:17,
16:20
specific [1] - 16:25
specifically [4] -
12:11, 16:17, 28:1,
28:15
specificity [1] - 19:14
speed [1] - 9:8
spent [1] - 5:12
stage [1] - 12:19
stand [2] - 9:14, 22:9
stands [1] - 19:25
Stanoch [1] - 24:12
start [6] - 3:24, 28:9,
28:16, 28:19, 30:5,
30:10
started [2] - 14:9, 28:8
starting [2] - 3:7, 29:7
statement [3] - 9:21,
16:25, 20:15
STATES [2] - 1:1, 1:9
states [2] - 24:3, 27:17
station [1] - 7:19
STATUS [1] - 1:5
stay [1] - 27:2
stenography [1] -
1:24
still [13] - 7:11, 8:19,
9:22, 11:19, 22:14,
25:1, 25:2, 29:17,
29:18, 29:19, 29:22,
29:25
stipulation [1] - 14:16
straightforward [1] -
11:15
strategy [1] - 12:16
Street [3] - 1:16, 1:19,
2:4
Streets [1] - 1:6
subject [3] - 12:1,
23:13, 25:3
subjects [1] - 7:10
submit [10] - 4:20, 5:2,
16:7, 16:10, 16:14,
16:16, 17:7, 17:9,
18:10, 20:8
subsequent [1] - 29:5
substantive [1] - 22:7
sufficiency [1] - 25:5
suggested [1] - 17:18

Suite [4] - 1:16, 2:10,
2:16, 2:19
supplement [1] -
24:25
supplementation [1] -
24:23
support [1] - 18:7
supporting [1] - 16:4
supposed [1] - 28:7
surmising [1] - 11:10
switch [1] - 5:7

T

Table [6] - 21:22, 22:1,
22:22, 22:24, 23:5
Tables [1] - 22:1
talks [1] - 10:21
tea [1] - 19:9
team [2] - 3:11, 27:5
technical [1] - 21:24
tee [1] - 5:4
teleconference [1] -
9:1
term [3] - 15:19, 20:3
terms [9] - 8:16, 9:18,
26:12, 26:13, 26:16,
26:18, 26:20, 26:23,
28:5
Teva [1] - 2:11
THE [4] - 1:1, 1:9, 3:1,
30:25
The court [92] - 3:3,
3:6, 3:14, 3:17, 4:4,
4:18, 5:21, 6:1, 6:3,
6:15, 6:18, 6:22,
6:25, 7:14, 7:21,
7:25, 8:2, 8:4, 8:9,
8:13, 8:15, 8:21, 9:2,
9:7, 9:24, 10:5, 10:9,
11:3, 11:9, 12:6,
12:13, 12:20, 13:2,
13:16, 13:18, 13:22,
14:17, 15:3, 15:12,
15:22, 16:6, 16:14,
16:19, 16:22, 17:3,
17:7, 17:12, 17:14,
17:20, 17:21, 17:23,
18:4, 18:11, 18:12,
18:17, 18:23, 19:4,
19:18, 19:21, 20:4,
20:22, 21:2, 21:5,
21:7, 21:25, 22:4,
22:20, 23:7, 23:17,
23:21, 23:24, 24:11,
24:13, 24:20, 25:6,
25:25, 26:4, 26:8,
26:12, 27:2, 27:11,
27:12, 27:14, 28:1,
28:6, 28:12, 28:21,

29:12, 30:6, 30:14,
30:17
they've [1] - 25:5
thinking [1] - 24:1
THORNBURG [1] -
2:15
three [4] - 5:12, 6:5,
13:7, 25:16
tied [1] - 10:1
timeframe [2] - 7:3,
8:22
timeframes [2] - 7:5,
7:11
today [3] - 4:24,
30:19, 30:22
topics [1] - 19:25
touch [2] - 4:22, 4:24
towards [1] - 9:23
train [1] - 7:19
transcript [2] - 1:25,
31:4
transcription [1] -
1:25
transportation [1] -
29:18
TRAURIG [1] - 2:9
travel [1] - 29:16
tremendously [1] -
14:21
trial [5] - 4:16, 4:23,
12:12, 12:16, 18:1
tried [1] - 4:21
TRISCHLER [1] - 2:6
true [1] - 12:12
try [3] - 8:24, 9:1,
20:17
trying [6] - 11:7,
11:24, 15:7, 29:25,
30:5, 30:9
turns [1] - 8:11
two [9] - 5:12, 13:7,
13:14, 23:10, 23:15,
23:25, 24:6, 24:17,
25:20
type [4] - 14:12, 14:16,
20:23, 21:24

U

U.S [1] - 1:6
ultimate [1] - 4:14
ultimately [1] - 16:4
unclear [1] - 10:21
under [5] - 12:21,
12:22, 13:1, 23:1,
29:18
undertake [1] - 3:19
unfortunately [1] - 5:7
UNITED [2] - 1:1, 1:9
universe [1] - 10:24

unless [1] - 27:2
unquote [3] - 4:25,
16:10, 17:25
unusually [1] - 26:20
unwieldy [2] - 3:10,
3:23
up [12] - 3:12, 5:4,
6:15, 6:22, 7:22, 9:7,
13:13, 22:4, 22:6,
26:9, 29:1
update [2] - 26:12,
27:4
updated [1] - 30:15
upset [1] - 3:20
USA [5] - 2:20, 6:19,
6:22, 7:18, 8:13

V

VALSARTAN [1] - 1:3
Valsartan [10] - 3:4,
5:11, 9:25, 10:2,
10:11, 10:13, 10:14,
10:22, 10:25, 18:25
various [1] - 27:6
vendor [1] - 30:8
verses [1] - 18:25
versions [1] - 14:23
versus [2] - 10:3,
10:23
view [1] - 3:22
virus [2] - 29:12,
29:19
vocabulary [1] - 15:9

W

wait [1] - 18:21
WALLACK [1] - 2:12
wants [2] - 4:7, 30:19
ways [1] - 15:10
Wednesday [1] - 1:7
week [2] - 4:19, 8:19
weekend [3] - 13:19,
13:20, 13:23
weeks [7] - 9:17,
23:10, 23:15, 23:25,
24:6, 25:16, 25:20
welcome [2] - 6:13,
9:8
WERNER [1] - 2:18
wheel [1] - 15:18
WHITELEY [5] - 1:18,
1:18, 13:25, 15:4,
15:20
Whiteley [3] - 13:25,
14:20, 15:1
whole [1] - 16:21
wholesaler [2] - 15:4,
15:23

wholesalers ^[4] -
2:24, 14:7, 15:14,
16:1
willy ^[1] - 23:1
willy-nilly ^[1] - 23:1
word ^[1] - 7:24
words ^[1] - 27:17
workforce ^[1] - 29:24
world ^[2] - 3:8, 3:10
writing ^[1] - 14:11
written ^[1] - 14:14
wrote ^[1] - 27:7

Y

year ^[1] - 9:25
Year's ^[1] - 29:20
yielding ^[1] - 26:20
York ^[1] - 2:23

Z

zealously ^[1] - 5:16
ZHP ^[5] - 2:5, 21:16,
29:8, 29:9, 29:24
ZHP's ^[1] - 30:7